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Federal Communications Commission  
Office of the Secretary

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February 29, 2008

**BY HAND**

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Suite TW-A325  
Washington, DC 20554

Re: **EB Docket No. 06-36**

Dear Ms. Dortch:

On behalf of PriorityOne Telecommunications, Inc., we are submitting herewith the original and four (4) copies of its its **Annual 47 C.F.R. § 64.2009(e) CPNI Certification for Calendar Year 2007** in the above-referenced proceeding.

Kindly address any questions concerning this submittal to the undersigned counsel.

Sincerely,

DAVIS WRIGHT TREMAINE LLP

James M. Smith  
Counsel for PriorityOne Telecommunications, Inc.

cc: Telecommunications Consumers Division, Enforcement Bureau (2 copies)  
Best Copy and Printing, Inc. (via e-mail)

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**PRIORITYONE TELECOMMUNICATIONS, INC.**  
**STATEMENT OF CPNI OPERATING PROCEDURES**

1. It is the policy of PriorityOne Telecommunications, Inc. (the "Company") not to use, disclose, or permit access to "Customer Proprietary Network Information ("CPNI"), as defined in the FCC's rules, for any purposes other than the following, all of which are permitted without customer approval under FCC rules:

- a. For the purpose of providing or marketing Company service offerings among categories of service (i.e., local, interexchange) to which the customer already subscribes.
- b. For the purpose of providing inside wiring installation, maintenance, and repair services.
- c. For the purpose of marketing "adjunct-to-basic" services, such as speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding, and certain centrex features.
- d. For the purpose of protecting the rights or property of the Company, or to protect users of its services and other carriers from fraud, abusive, or unlawful use of or subscription to such services.

2. The Company has established a program to inform and train personnel that they may not use, disclose, or permit access to CPNI for any purpose other than those set forth above. At present, the Company does not engage in outbound marketing using CPNI. In fact, at present the Company is not doing any marketing of any kind. The Company has an express disciplinary process in place to discipline violations of its CPNI policy.

3. Because the Company does not use, disclose or permit access to CPNI except as described above, it does not need to maintain a record of sales and marketing campaigns that use customers' CPNI, or of instances where CPNI is disclosed to third parties, or where third parties were allowed access to CPNI.

4. Because the Company does not use CPNI in marketing, the Company does not utilize a notification and customer approval process (i.e., an Opt-Out or Opt-In process). If the Company changes its marketing procedures, an appropriate customer notification process will be instituted.

5. At this time, the Company does not offer on-line access to customer information. If in the future the Company allows customers to access their accounts and billing information online, then the Company will take measures to secure the customer information with proper authentication, including the use of passwords and other methods that comply with FCC rules to protect CPNI.

6. Customers who contact the Company via inbound calls are not able to access their call detail or other CPNI. Instead, the Company will return calls to the customer at his or her telephone number of record. If the Company cannot reach the customer at the customer's telephone number of record, no CPNI will be released via telephone communications. If a customer so requests, the Company will send CPNI in written format to the customer's address of record.

7. Customers who present themselves at the Company's primary business address and who *request CPNI are asked for proper photographic identification (i.e., state issued driver's license or the equivalent).* CPNI will only be disclosed if the customer presents valid photo ID matching the customer's account information.

8. The Company has not detected any unauthorized access to CPNI, either by employees or third parties such as pretexters. The Company has not received any customer complaints regarding CPNI in 2007.

9. The Company will notify the customer immediately if the customer's address of record is created (except at the time of service initiation) or changed. This notification is made by mail to the customer's pre-existing address of record, and does not reveal the changed information.

10. In the event of any breach of a customer's CPNI as described in section 64.2011 of the FCC rules, the Company will, as soon as practicable and in all events within seven (7) days of determination of the breach, notify law enforcement through <http://www.fcc.gov/eb/cpni>, and subsequently notify the customer(s), in accordance with the procedures and in the sequence prescribed by that rule section. The Company will maintain a record of any such breaches and notifications for at least two (2) years,

11. The Company has in place a supervisory review process regarding compliance with its CPNI policy.